

September 18, 2001

MEMORANDUM FOR: BankCard Holders and Approving Officials

FROM: R.J. Dominic /s/ *R. J. Dominic*
Director, Finance Office/Comptroller

Helen M. Hurcombe /s/ *Helen Hurcombe*
Director, Acquisition and Grants

SUBJECT: Guidance on Retention of BankCard Statements of Account at Remote Locations

The National Oceanic and Atmospheric Administration (NOAA) has received approval from the Department of Commerce Office of Financial Management to implement interim procedures for retention of BankCard documentation at remote locations.

NOAA is nearly complete with the full implementation of the Commerce Purchase Card System (CPCS). As part of CPCS implementation, BankCard holders and approving officials receive training which enables them to verify, reconcile, and certify Statements of Account on-line through the CPCS. Effective October 1, 2001, for cardholders and approving officials trained in the CPCS, hard-copy Statements of Account will no longer be required to be forwarded to their servicing Finance Office. The Statements will be retained by the approving official. These new procedures will lead to greater administrative efficiencies and reduce paperwork and processing costs.

Procedures for Processing BankCard Documents

Cardholders and approving officials must follow the procedures below to retain documentation supporting BankCard transactions.

1. The cardholder or designated group administrator will reconcile the Statement of Account on-line in CPCS.
2. The cardholder will sign the hard-copy Statement of Account.
3. The cardholder will forward the signed Statement of Account with supporting documentation, i.e. purchase-ordering log and original receipts, to the approving official within 5 days of receipt in accordance with Commerce Acquisition Manual (CAM) requirements.
4. The approving official will review and approve reconciled transactions in CPCS no later than 15 days after the cardholder's receipt of the Statement of Account in

accordance with CAM requirements.

5. The approving official will sign the hard-copy Statement of Account.
6. The approving official will file the signed Statement of Account with supporting documentation in a secure location.
7. The servicing Finance Office will select random samples of all BankCard payment transactions to verify the validity of the payments and compliance with records retention policies and procedures. Approving officials will forward Statements of Account and supporting documentation to the servicing Finance Office for the random sample review.

Document Retention Requirements

Approving Officials are designated as document retention officials for BankCard documentation retained at remote locations and will be responsible for maintaining supporting documentation in accordance with document retention requirements. The signed Statements of Account, along with supporting documents, are defined as accountable officer's records. As such, these documents must be retained in accordance with General Records Schedule 6 promulgated by the National Archives and Records Administration and General Accounting Office guidance in Title 8, *Records Management, Policy and Procedures Manual for Guidance of Federal Agencies*. **As a general rule, these documents must be retained for a period of 6 years and 3 months.** Specifics regarding General Records Schedule 6 can be found at <http://ardor.nara.gov/grs/grs06.html>. Additional guidance can be found in the Department of Commerce *Accounting Principles and Standards Handbook*, Chapter 15, *Records Management* at <http://www.osec.doc.gov/ofm/acctg/ch15.htm>. This Chapter also provides the contact point for NOAA's Records Management Officer who can answer specific questions.

Approving officials must retain their records for annual review by the Head of the Contracting Office as required by the CAM. In addition to this review, the Finance Office will also randomly select payment transactions for review and will require that supporting documentation be promptly forwarded to the servicing finance office to verify validity of payments. The Finance Office will be responsible for ensuring that the statutory requirements in Title 8 are being followed and, as such, the Finance Office review will also encompass compliance with record retention requirements.

The policies in this memorandum become effective as soon as cardholders and approving officials have the necessary training and capability to use the CPCS. Until that point, cardholder's Statements of Account and supporting documentation should continue to be forwarded to the Finance Office within 15 days of receipt by the cardholder as required by the CAM.

Please contact your servicing ASC Finance Office in the field, or the CAMS Help Desk in the D.C. metropolitan area for information on CPCS training or procedures. Contact Lois Coleman or Brad Hickson on (301) 413-8591 for any questions on the policy for retaining BankCard documents at remote locations.

cc: CFO/MB Chiefs
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